## Federal Defenders OF NEW YORK, INC.

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David E. Patton
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Southern District of New York Jennifer L. Brown Attorney-in-Charge

April 21, 2021

By ECF and by e-mail

Honorable Richard M. Berman United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Alixa Olivas Sauceda, 21 Cr. 77

Dear Judge Berman:

Conference is adjourned to 5/18/21 at 12:00 pm. Defense counsel bail submission is due 4/28/21. Government response is due 5/5/21. Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter.

SO ORDERED: Date: 4/21/21

Richard M. Berman, U.S.D.J.

I write on consent (Assistant U.S. Attorney Kedar Bhatia) to respectfully request that the Court adjourn the conference currently scheduled for April 27, 2021, at 12:00 p.m., and reschedule it for a date convenient for the Court after May 12, 2021. The reason for the request is that I am beginning trial on that date in front of Judge Castel. I further request that at the next conference the Court hold a bail hearing, and I will file a separate letter explaining why release is warranted under the Bail Reform Act. As of this writing, the Government opposes Ms. Sauceda's release.

If the Court grants this request, we consent to the exclusion of time under the Speedy Trial Act until the next conference date.

Respectfully submitted,

/s/

Martin S. Cohen Ass't Federal Defender (212) 417-8737

Cc: Kedar Bhatia, Esq., by ECF and e-mail
Ms. Alixa Olivas Sauceda, Essex County Corr. Facility, Register No. 26205-509